

Hearing Date and Time: October 6, 2009 2:00 p.m. (prevailing Eastern Time)
Objection Deadline: October 1, 2009 4:00 p.m. (prevailing Eastern Time)

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Attorneys for the Agents to the Prepetition Secured Lenders

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
LEXINGTON PRECISION CORP., <u>et al.</u>,	:	Case No. 08-11153 (MG)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**NOTICE OF HEARING OF PREPETITION SECURED LENDERS'
MOTION SET ASIDE CERTAIN STANDSTILL AGREEMENTS,
TO PERMIT GORDIAN GROUP TO SOLICIT INTEREST IN
POTENTIAL SALES OF THE DEBTOR'S BUSINESS UNITS
AND/OR ASSETS, AND FOR RELATED RELIEF**

PLEASE TAKE NOTICE THAT CapitalSource Finance LLC, as agent under the
Prepetition Credit Agreement¹ and CSE Mortgage LLC, as agent under the Prepetition Loan
Agreement (together, the "Agents"), filed a motion (Docket No. 718, the "Motion") on

¹ Capitalized terms not otherwise defined herein have the meanings set forth in the Agents' Proposed Disclosure Statement.

September 23, 2009, to a) set aside certain standstill agreements initiated by Debtors and their representatives; b) permit Gordian Group to solicit interest in potential sales of the Debtors' business units and/or assets; and c) seek relief requiring the Debtors to cooperate with the Agents in order to effectuate the Motion.

PLEASE TAKE FURTHER NOTICE that objections or responses to the Motion, if any, must (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the U.S. Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"); and (c) set forth the name of the objecting party, the basis for the objection, and specific grounds therefor.

PLEASE TAKE FURTHER NOTICE that all objections and responses must be filed with the Bankruptcy Court no later than **October 1, 2009 at 4:00 p.m. (prevailing Eastern Time)**. In accordance with General Order M-242, registered users of the Bankruptcy Court's case filing system must electronically file their objections and responses. General Order M-242 may be found at www.nysb.uscourts.gov. All other parties-in-interest must file their objections and responses on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format) and deliver a hard copy directly to the chambers of Judge Martin Glenn.

PLEASE TAKE FURTHER NOTICE that all objections and responses must be served, so as to be received no later than **October 1, 2009, at 4:00 p.m. (prevailing Eastern Time)**, upon: (a) the attorneys for the Agents, Waller, Lansden, Dortch & Davis LLP, 511 Union Street, Suite 2700, Nashville, Tennessee, 37219 (Attn: John C. Tishler); (b) the Debtors, Lexington Precision Corporation, 800 Third Ave. 15th Floor, New York, New York 10023 (Attn: Michael A. Lubin); (c) the attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue,

New York, New York 10153 (Attn: Victoria Vron); (d) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Paul Schwartzberg); (e) the attorneys for the statutory creditors' committee, Andrews Kurth LLP, 450 Lexington Avenue, New York, New York 10017 (Attn: Paul Silverstein); and (f) the attorneys for the Debtors' postpetition agents, O'Melveny & Meyers, LLP, Times Square Tower, 7 Times Square, New York, New York 10036 (Attn: Gerald Bender).

PLEASE TAKE NOTICE that a hearing to consider the Motion will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **October 6, 2009 at 2:00 p.m. (prevailing Eastern Time)** (the "Hearing"), or as soon thereafter as counsel can be heard; provided, however, that the Agents may adjourn the Hearing from time to time without further notice other than the announcement in open court of such adjournment on the date scheduled for the Hearing or filing and serving a notice of adjournment.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the
Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: September 23, 2009
New York, New York

/s/ John Tishler
John C. Tishler

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